Introduction

Executive Summary

Metal plating facilities are establishments primarily engaged in all types of electroplating, plating, anodizing, coloring, and finishing of metals and formed products of trade. Most metal platers are small, family owned businesses. The industry provides support to other larger industries, particularly manufacturing industries. The automotive, electronics, machine equipment, and defense industry are the four largest industry segments served by metal platers.

The metal plating process can impact the environment, including air, water, and soil, in a very intense manner. The chemical processes used in metal plating involve the use of various toxic materials, and generate significant amounts of solid and hazardous waste. chromium, a chemical compound intrinsic to the chrome plating process is a known carcinogen.

The metal plating industry is regulated by various federal, state, and local agencies including the United States Environmental Protection Agency, the California Air Resources Board, the California Water Resources Control Board, the California Department of Toxic Substances Control, the San Diego Regional Water Quality Control Board, the County of San Diego Air Pollution Control District, and the County of San Diego Department of Environmental Health Hazardous Materials Division (HMD).

HMD regulates over 13,000 businesses countywide and takes formal enforcement (criminal; civil; administrative) against approximately 30 businesses each year. In 2004, the HMD identified twenty-six (26) metal plating facilities in San Diego County and reviewed their compliance history. Since 2001, the HMD has filed 7 criminal/civil cases and 2 administrative enforcement cases against metal plating facilities within San Diego County. Given the low number of metal plating shops within San Diego County, the number of formal enforcement cases taken against metal plating shops since 2001 is considered to be fairly significant. Because of the increased level of non-compliance demonstrated within the metal plating industry, the HMD increased the inspection frequency for metal plating facilities starting in fiscal year 2003-04 from once every 18 months to annually.

On December 2, 2004 HMD in coordination with the Industrial Environmental Association and Sheffield Platers provided the first annual Plating Shop Workshop. Subsequent workshop updates were held in January and December of 2005 and November of 2006 and of 2007 in an attempt by HMD to further assist small metal plating facilities within San Diego County to obtain improved compliance with their hazardous materials and hazardous waste regulatory Plating Shops were provided the opportunity to receive a one time fix-it inspection if they attended the first annual Plating Shop Workshop. Many took advantage of that opportunity and as a result HMD has seen an increase in compliance from several of the plating shops in San Diego County.

HMD developed this Compliance Manual for Plating Shops to further assist small metal plating facilities within San Diego County in meeting their hazardous materials and hazardous waste regulatory requirements. It is highly recommended that owners, operators and key employees read this manual and take advantage of the information to help them improve their regulatory compliance.